

IV.D.1 Applicant Identification

Ione Band of Miwok Indians
9252 Bush Street Suite 2
Plymouth, CA 95669

IV.D.2. Funding Requested

\$500,000

IV.D.2.a. Grant Type

Single Site Cleanup

IV.D.2.b. Federal Funds Requested, IV.D.2.b.i Funds Requested

The IBMI requests \$500,000 to clean up the former New London Mine site. The Target Area, Site 1, is located on the 47.7 acres in the north section on the eastside of the property off Old County Road between Plymouth and Jackson, California.

IV.D.2.b.ii Cost Share Waiver

IBMI are requesting a cost share waiver.

IV.D.3. Location

The Subject Property encompasses a total area of 47.44 acres that are not in Trust. The 47.44 acres were purchased by the IBMI. The Subject Property is vacant land located at 40 Old County Road in Plymouth, California. This land is connected to IBMI Trust Property at the south end, and to the Plymouth City Limits at the north end of the property. The former New London Mine is located on the property in the southwest corner and on the north end of the property is Old County Road which was an old stagecoach road that ran between Plymouth and Jackson, California.

IV.D.4. Property Information

1. The 47.44 acres of vacant land consists of a former mine shaft. The Subject Property and surrounding area are within the western foothills of the Sierra Nevada mountain range (E&E 2014). Subject Property is a depressed area with heavily overgrown brush and trees. The western and southern parts of the Subject Property were originally developed as the New London Mine and associated processing mill. Within a small portion of the southwestern corner of the Subject Property, a temporary lumber mill operated at an unknown time. Periodic livestock grazing has occurred on the property since mining activities ceased (E&E 2014). The former mine shafts are closed. The foundations of former structures remain at the Subject Property. An ephemeral watercourse flows north to south through the Site. **The Target Area for this grant is the north section of the eastside of the property.**
2. 40 Old County Road in Plymouth, California 95669 (Assessor's Parcel Numbers that make up the 47.44 acres number 000-807-043, 000-807-044, 000-807-045, 000-807-046 and 000-807-047)
3. Ione Band of Miwok Indians are the current owner of the property

IV.D.5. Contacts

IV.D.5.a. Project Director

Robert Stevens, Project Director
9252 Bush Street
P.O. Box 699
Plymouth, CA 95669
Office: (209) 245-5800, Mobile: (209)217-7635
Robert@ionemiwok.net

IV.D.5.b. Chief Executive/Highest Ranking Elected Official

Sara Dutschke Setshwaelo, Chairperson
Ione Band of Miwok Indians
Phone:209.255.8005, Mobile:209.256.9799
9252 Bush Street
Plymouth, CA 95669
sara@ionemiwok.net

IV.D.6. Population

The IBMI is a federally recognized Indian Tribe in the city of Plymouth, located Amador County California. The total population of Plymouth is 1,005 people and Amador County's population was 39,091 at the last census. The IBMI have a membership of 740 tribal members.

IV.D.7. Other Factors Checklist

Other Factors	Page #
Community population is 10,000 or less.	1
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	1
The proposed brownfield site(s) is impacted by mine-scarred land.	1
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	NA
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	2
The proposed site(s) is in a federally designated flood plain.	NA
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or will incorporate energy efficiency measures.	4

IV.D.8. Letter from the State or Tribal Environmental Authority (not included in the 2-page limit) IBMI will act as its own Tribal Environmental Authority with the direction if the EPA and Qualified Environmental Professional and the State's Toxic Substance Department.

1 Project Area Description and Plans for Revitalization 1.a Target Area and Brownfields

The Ione Band of Miwok Indians (IBMI) is a federally recognized Indian Tribe located in Plymouth, California, home to 1,035 residents. The IBMI are a non-gaming Tribe with a membership of 750 Tribal members. California has the largest Native American population (720,000) in the country (US Census). In the early 1900s, the United States government promised the IBMI it would restore its land base in Plymouth, Amador County. The IBMI worked tirelessly for nearly two decades to secure a land base, despite the promise from the US government to restore its land. In March 2020, after several years of consideration, the Bureau of Indian Affairs (BIA) acquired land in Trust for the IBMI. Situated on its ancestral land, the land base is a 226-acre parcel (in Trust) and is connected to the 47.44-acre parcel (not in Trust). The 47.44-acre parcel (the Property) was purchased to develop a community center, park and recreation area, affordable and senior housing for Tribal members and Plymouth residents. Tribal leadership, management staff, and local partners are now positioned to build an inclusive community, one that is free from environmental and health hazards that focuses on an equitable revitalization plan to help spur economic growth for the city of Plymouth and IBMI members. However, due to years of gold mining in the area, there are tailings derived from separating the gold from the rocks. These tailings contain arsenic, lead and mercury in quantities that are harmful to the public. The tailings are scattered throughout the Target Area, which includes the City of Plymouth and the Trust Lands. As of October 28, 2020, the IBMI is the sole applicant and owner of the Property (47.44-acre parcel) and will retain ownership for the duration of time in which Brownfields Cleanup Grant funds are disbursed for the cleanup of the site(s). This application is presented in accordance with the Tribe's goal of advancing the economic prosperity of the IBMI and the City of Plymouth. The IBMI Tribe is applying for \$500,000 in Brownfield Cleanup Grant funding to address hazardous mercury, arsenic and lead contaminations at a brownfield sites adjacent to IBMI Trust Land. The work will focus on the former New London Mine site, a former gold mine and lumber mill that is now vacant and blighted land with remnants of the old mining foundation. The Clean-up Grant funds will be used to carry out cleanup activities on at the brownfield sites, former New London Mine. Using Brownfield funds, IBMI hopes to transform the mine scarred property to a desirable space and reduce human health risks posed by contamination associated with mining. The cleanup will reduce human health risks to residents, Tribal members, and workers in the community. Revitalization of the Brownfield site will attract new residents, and tourists who drive through Plymouth toward Plymouth's wine country. This grant project will focus on 47.44 acres formerly known as the New London Mine, which is located adjacent to the Trust Land. The Target Area, Plymouth, was settled during the time of the Gold Rush. Plymouth has a total area of 0.9 square miles (2.3 km²), of which 98.66% is land and 1.34% is water. It is located just 35 miles south east of Sacramento, in the beautiful foothills of Central California and only a few miles west of the towering forest of the Sierra Nevada Mountain that once connected many Gold Rush-era towns. Because of the historic use of mercury in gold mining operations, the western foothills of the Sierra Nevada mountain range are home to some of the most hazardous abandon mines (US Department of Interior). Mercury from abandon mines have led to pollution in numerous watersheds and even in some major waterways in the Sierra Nevada Range. Pollution has a negative impact on Tribal members and residents. Plymouth has poor air quality (ozone level of 78 percentile); and substandard drinking water (54 percentile), and groundwater (50 percentile) (CalEnviro Screen 3.0). The western and southern parts of the Project were originally developed as the New London Mine and associated process mill. The property contains hazardous material such as mercury, arsenic and lead all remnant of mining.

ii. Description of the Priority Brownfield Site: The former New London Mine is in the southwest corner and on the north end of the Property. The Property was impacted by mining and wood milling from the 1852 to 1942, and has arsenic, lead and mercury contamination, and is characterized by rolling hills covered by grasses and oak trees crossed by a seasonal flowing ephemeral watercourse (dry creek). Undeveloped land is located immediately adjacent to the Property to the west, south, and east. The former mine shafts on the Property is a depressed area heavily overgrown with brush and trees; and are assumed to be closed. The Sites are: 008-070-043, 008-070-044, 008-070-045, 008-070-046, and 008-070-047. Five parcels make up the 47.44-acre site are described as the following parcels: 1) Parcel #1 (Site #1) APN 008-070-043: in the northeast corner of the Property that runs along Old Country Road located closest to the former New London Mine shaft, is a source of contamination. The seasonal dry creek enters the property on this parcel. 2) Parcel #2 (Site#2) APN 008-070-044: in the north central section along Old Country Road of the Property and borders the Eastern Access Road. This parcel appears to have the largest area for development, it is sparsely covered with vegetation. The dry creek crosses through parcel on the southwest side. Three spots appear to be the potential source contamination. 3) Parcel #3 (Site#3) APN 008-070-045: is the connect to the IBMI Trust Land and is in the northeast corner of the Property along the eastside of the Eastern Access Road. The parcel appears to have a large land area for development; unlike the other parcels, it is free from overgrown trees, brushes, and the dry creek. 4) Parcel #4 (Site#4) APN 008-070-046: this parcel is in the south-central section of the property with heavily overgrown trees and brushes. The seasonal dry creek flows from north to south on this parcel, it is a potential source of contamination. 5) Parcel #5 (Site#5) APN 008-070-047: located on the southwest corner of the Property. It is the site of the former mill (south), New London Mile Shaft (central), and an Unnamed Mine Shaft (north). This parcel contains several spots for potential contamination.

In addition to the remnants of gold mining operation that was once there, fine particles suspended in water have the potential to damage the environment by releasing toxic metals, causing erosion and sinkholes, and contaminating soil and water supplies. Restoring surrounding the wetlands will prevent flooding and bioremediation runoff into nearby waterways. The Cleanup Grant will enable IBMI to conduct planning and site assessments; develop site-specific cleanup plans and refine the reuse plans for Site #1 and Site #5 to make it safe for Tribal members and residents. The Cleanup Grant funds will be used to remove or remediate contaminants from Site #1 and Site #5. There were high levels of arsenic, mercury, and lead throughout the entire Property caused by mining. Areas in Site #1 and Site #5 where elevated concentrations of arsenic and lead have been identified would be excavated to commercial and industrial cleanup standards to accommodate the potential development of a community center, parking lot, or other commercial/industrial use.

The vacant Property is located at 40 Old County Road in Plymouth, California, and was originally developed as the New London Mine and associated processing mill. The former New London Mine is in the southwest corner and on the north end of the Property. As part of the Phase II Assessment, soil samples were taken and identified in the north-central portions of the Site there where elevated concentrations of arsenic and lead. The EPA Brownfield Cleanup grant funds will be used to cleanup a 5-acre section (the Site) in the north section of the property to construct a community center. IBMI will remove or remediate contaminated surface soils from the Site; the remedial action will address the contamination that could expose human and environmental receptors to contaminants present in the soil. The Property is in flood Zone X, which is an area outside of the Special Flood Hazard Area. Adjacent to the Property to the north, across Old County Road, is the location of the former Plymouth Consolidated Mine. Area land use is primarily

commercial and residential and agricultural or undeveloped. The Property is only used occasionally for grazing cattle.

1.b.i Reuse Strategy and Alignment with Revitalization Plans: This project is guided by IBMI Tribal Council's Directive, Amador County's Housing Element, and the city of Plymouth's General Plan. These documents include priorities to promote development of parks/recreation space, community center and affordable housing, the IBMI long term plan for the Property. From Tribal Council's Directive, a master development plan is currently being drafted by planners that will include construction of a community center, outdoor space, and housing for special populations. The master development plan will be in line with Amador's Housing Element, it sets policies to support the development of affordable housing for special groups in each economic segment of the population to ease displacement and overcrowding in the community. Also, the IBMI, confers with the city of Plymouth on land use issues to increase the density of all new housing development. Plymouth adopted a comprehensive update to its Zoning Code on March 27, 2014, it incorporated range of affordable housing-related concepts, including density bonus provisions and use listings required by state. This project is consistent with Plymouth's General Plan, to develop a neighborhood park in the southern area of the city (in the area near Pacific and Bush Street), which is currently deficient in park space. The Property is in the southern area of town just a few feet away from Bush Street. The General Plan states, an adequate neighborhood park should be around five acres. The community center will serve as a permanent site for the Tribe's monthly General Council meetings and annual Chawse event. For non-tribal use, the facility will be available for rent to the community. The community center will provide an event space, park and sports field that will bring people to the area. Construction of the facility and housing will create jobs for residents. Redevelopment of the site, also, aligns with IBMI's Tribal Directive that states any new development proposed on tribal or tribally owner land should factor in the importance of restoration and preservation of ecosystem function to maximize health and wellbeing of Tribal members and the surrounding community. The Tribe will consult with the local government, contractors, planners, and the community to prioritize activities and projects that ensure restoration, preservation and management of Tribal lands and natural resources in a sustainable manner. *ii Outcomes and Benefits of Reuse Strategy* Upon completion of the cleanup, the IBMI plan to construct community center, park/recreation space, senior housing, and affordable housing for the use of the Tribe, Tribal members, and the surrounding community. Revitalization will improve the economic welfare of the Target Area and the IBMI by: 1) an increase to land value for both commercial and residential properties, 2) stimulate other economic development activities, 3) attract new investments, 4) creation of jobs, and 5) the creation of a revenue source for the Tribe. The grant will facilitate the creation of a park, greenway, recreational property, and develop vacant and blighted land in the Target Area. Removal or capping the contaminated soil will prevent further surface water runoff contamination and reduce the potential for further groundwater and drinking water contamination, and air pollutants. Poor air quality and drinking water can lead to cancer and respiratory issues - targeting and mitigating the contaminants on the site through the redevelopment strategy will protect the physical health of Tribal members and the Target Area residents. Revitalization will improve the economic welfare of the Target Area and the Tribe by: 1) an increase to land value for both commercial and residential properties, 2) stimulate other economic development activities, 3) attract new investments, 4) creation of jobs, and 5) the creation of a revenue source for the Tribe. The Brownfield Cleanup grant help to facilitate the creation of a park, greenway, recreational property, and develop vacant and blighted land in the Target Area. Construct of community center and park/recreation area will meet the

immediate needs for the Target Area, and surrounding community. Amador County home to 39,752 has a higher number of persons over the age of 65 years old (27.5%) (US Census), seniors have a greater need for a community services that could be offered at a community center (<https://www.amadorgov.org/home/showdocument?id=32743>). Children make up about (20%) of the Amador county population (US Census), how have a high rate of obesity than their counterparts. A community center and the park/recreation space will create a place where families and groups can meet for classes, club meetings, events, and special occasions this will improve the mental and spiritual well-being of Tribal and Target Area residents.

Removal or capping the contaminated soil will prevent further surface water runoff contamination and reduce the potential for further groundwater and drinking water contamination, and air pollutants. Targeting and mitigating the contaminants on the site through the redevelopment strategy will protect the physical health of Tribal members and the Target Area residents. Poor air quality and drinking water can lead to cancer and respiratory issues. Amador county residents are twice as likely to die from a chronic lower respiratory disease than those in other parts of the state. The grant will help to advance cleanup of the Target Area and its transformation from a major health hazard to a healthy environment for cultural practices and environmental education practice, as well as a park and green space that will agree with Plymouth's General Plan. The cleanup will eliminate the Site from serving as a source for contaminated dust as well as removing the potential for the identified contaminants eroding and moving into other areas. The planned cleanup will facilitate beneficial health development by eliminating threats to human health by removing any new exposure pathways to the public or waterways. With the removal of contaminants, both tribal and non-tribal persons health will improve with better air and water quality; and the community center and park will give the community a place to hold meetings/classes or exercise. Tribal Staff anticipates this Brownfield Redevelopment will increase the land value for both commercial and residential properties; and improve the economic and physical welfare of the surrounding community. Removal of contaminated soil will prevent further surface water runoff contamination and reduce the potential for further groundwater contamination. The local economy will see a boost in revenue through increased property and sales taxes. This project will help spur economic growth in a distressed rural area. None of the planned uses will be possible without a comprehensive cleanup due to the significant levels of contamination present in the soil throughout the Site. This project will facilitate renewable energy from solar and will incorporate energy efficiency measures.

c. Strategy for Leveraging Resources. The IBMI are a nongaming Tribe who must rely on grants to carry out large projects. IBMI is eligible for various state, tribal and federal programs, and is currently implementing the Indian Housing Block Grant (IHBG) program which could be used toward affordable housing activities. The Tribe has Bureau of Indian Affairs (BIA) Transportation funds that could be used to expand or improve the roads on the Subject Property. The Tribe is eligible to apply for the Indian Housing Block Grant (IHBG) Competitive Program, and state housing grants and tax credit programs. California grants and loan programs under several departments – Strategic Growth Council, Housing, Department of Toxics and Substances Control, Housing and Community Development - are also available for site cleanup, parks, green infrastructure, and sustainable development. These funding sources, mostly generated through state bonds, can be used to develop new housing, public facilities, and infrastructure. Also, the Tribe is eligible to apply for grants from the National Park Service to sustain the Tribal Historic Preservation Office (THPO) and cultural activities on the project. The Tribe will explore its eligibility to apply for the EPA's Tribal 319 and the USDA Rural Community Facilities

Guaranteed Loan grant funded programs. Over the 3-year grant cycle, the Tribe will identify General Tribal funds to offset the costs for this project. The Tribal Grants Manager and Accounting Staff will ensure that the Tribe does not duplicate sources discussed in 3.b. Description of Tasks/Activities and Outputs or sources used to meet the cost share, if applicable. ii Use of Existing Infrastructure: This grant will facilitate the use of existing infrastructure within the Target Area, some overhead power transmission line that transects the site from north to south. The Tribe can and will use the existing roads to access the Property. The Property is located to the east of the IBMI Tribal Office and a residential area that is served by existing water, power, roads, and phone lines. The Tribe plans to connect to the current water and sewer systems. The Tribe does anticipate some additional infrastructure needs for broadband, internal streets, pedestrian, sidewalks, curbs, and gutters that will be funded through a combination of the following: BIA, state infrastructure district financing such as Enhanced Infrastructure Financing Districts and Community Revitalization Investment Authorities, State Infrastructure Bank, USDA funds.

2. Community Need and Community Engagement There is little data available for the Target Area (Plymouth) due to its small population; therefore, the for the data listed here is for the county of Amador. The Tribe does not have the financial resources to carry out this project without putting undue strain on the Tribe's budget. The IBMI is a nongaming Tribe who relies on California's Revenue Share Trust Fund, these funds are revenue from gaming Tribes in California that are shared with nongaming Tribes to support the Tribal government and emergency service programs for members. The Brownfield Cleanup grant will help the IBMI meet the needs of the community that has an inability to draw on other initial sources of funding to carry out environmental assessment, and subsequent reuse in the Target Area, Plymouth, because of the small population (1,035) and low income (\$60,917 median income) of the community. The Tribe does not have funds to carry out the necessary environmental assessment, remediation, and reuse without the EPA Brownfield and Assessment grants. The Tribe's budget will be further strained without the much-needed assistance for this project. While the area is not designated Opportunity Zone, Indian tribes are classified as economically distressed communities. Like most rural communities, Amador County, was heavily impacted by the compounding effects of the declining timber and mining industries. The population of Amador County is about 39,752 people with median household incomes of (\$61,198) which is 15% lower than the states. The County also has a higher unemployment (9.3%) rate and poverty rate (13.9%). Amador County's poverty has continued to increase, 3.4% from 2000 to 2012, which was higher than the other foothill counties in the region. Median household and per capita income (\$30,100) are lower than the state and national. As a result, Amador County lacks the essential ingredients that generally, foster successful redevelopment that lead to higher income, jobs, etc. This grant will provide funding for environmental, cleanup, planning activities, redevelopment that otherwise would not take place, and sensitive populations will continue to be negatively impacted. Persons living alone, especially older persons, often have a greater need for recreational activities or other meaningful contact for their physical, mental, and social health and well-being. More than half (55 %) of all Amador County households include someone 60 years or older. This points to a potentially tremendous demand for recreation programs and facilities for older adults. As new developments come to Plymouth, they will need to provide parkland to at least maintain this ratio (Amador County Park and Recreation Master Plan, 2016).

ii Threats to Sensitive Populations ii.1 Health or Welfare of Sensitive Populations Sensitive populations are disproportionately affected by contaminants in the air, water, and soil because they generally tend to have more heart and lung issues. Many of the extremely low-income households

will fall within a special need/sensitive population category (disabled, seniors, large families, or female-headed households). Amador County has a higher number of persons over the age of 65 years old (27.5%). Of those under 65 years old 11% are disabled. Poverty rate is 12%, with half of those being female headed households. Children under the age of 18 years makeup about 20% of the population (US Census). Vulnerable residents specially veterans (10% of the population), and Latino (14.5% of the population) origin are the most at risk and experience consistent health disparities. Children under the age of 18 years old make up approximately (19.2%) of the population. People of color account for (22.7%) of the population in Amador County (US Census). The cleanup will facilitate beneficial health development by removal of any new exposure pathways to the public and waterways.

2. Greater Than Normal Incidence of Disease and Adverse Health Conditions: Community Health Needs Assessment (CHNA) prepared by Sutter Health identified the top three significant community health needs in Amador County: 1) Access to Mental /Behavioral/Substance Abuse Services, 2). Access to Quality Primary Care Health Services, 3. Access to Basic Needs Such as Housing, Jobs, and Food. Top priority is access to mental/behavioral/substance abuse Services. Amador has the third-highest suicide rate of any county in California (2018 Amador County Mental Health Services). The downturn that Amador experienced after the closure of several lumber mills in the 1980s and 1990s had a significant impact on the community's economy. Many people work in the nearby casinos, arts and entertainment industry all have been severely affected by COVID19. Financial struggle can lead to substance abuse, which contributes to suicide risk. Priority #2, access to quality Primary Care Health Services, for the past three decades, the number of hospitals in American rural areas has been declining at a steep pace. Among California's 50 rural hospitals, four are at high risk of closing, twenty have shut down since 1995. (SacBee July 2019). Priority #3, Access to Basic Needs such as Housing, Jobs, and Food, according to Amador County Housing Needs Report 2020, 929 low-income renters do not have access to affordable housing, 87% of low-income are paying more than half of their income on housing expenses.

3. Disproportionately Impacted Populations: The leading causes of death in Amador County are malignant neoplasms and heart disease. Hazardous chemicals are often stored in containers on land or in underground storage tanks. Leaks from tanks can contaminate soil and groundwater. One common contaminant, arsenic, occurs naturally in some rocks and soil and is often found in groundwater in California, it can cause cancer. Amador County residents have a higher rate of chronic lower respiratory (7.6 per 10,000) disease than the surrounding counties (7.3) and the state of California (3.5) (Amador Community Assessment Health Survey,2014). Amador county residents (48.7-female/53.59-male per 100,000) have a high rate of tracheal, bronchus and lung cancer compared to the state (32.5-female 45.5 -male per 100,000) (www.healthdata.org, 2014). The county is an ozone nonattainment area, that means it does not meet (or that contributes to ambient air quality in a nearby area that does not meet) the national primary or secondary ambient air quality standard for a National Ambient Air Quality Standards (US EPA). The ozone can irritate the lungs, cause inflammation, and make chronic illnesses worse, even at low levels of exposure. Children and the elderly are sensitive to the effects of ozone. Children are exposed to lead it can adversely impact their learning and developmental skills. Amador county public school children in grades K-12 receiving special education services increased by two thirds in the past several years; last year they accounted for 16% of the total enrollment (Amador Community Assessment Health Survey,2014). The cleanup will facilitate beneficial health development by removal of any new exposure pathways to the public or waterways.

2.b Community Engagement *i Project Involvement & ii Project Roles* the Tribe has a relationship with local, state, and federal partners to help define environmental priorities and leverage resources. The partners will be involved in the design of a cleanup plan, listed below.

Name of Organization	Description	Specific involvement
CA Dept. of Toxic Substance, Tami Trearse 916-255-3747	DTS ensures the project is compliant with regulations	Will provide guidance on toxic cleanup
Public Works Director, Plymouth, Selby Beck PublicWorks@cityofplymouth.org	PW is responsible for sewer and storm drains	Will provide guidance on the cleanup and infrastructure needs
Amador County Board of Supervisors District 5, Brian Oneto BOneto@amadorgov.org	Official with knowledge of redevelopment projects	Liaison with the county staff and residents, and provide feedback on the impact and benefit to the county

iii Incorporating Community Input A virtual meeting was held on 10/15/2020 to explain the project and timelines, what the community can expect and to answer pertinent questions about the cleanup process. Unfortunately, no one from the public attended the meeting. At the meeting, information was shared with staff and leadership on site selection, proposed cleanup activities, future development plans, schedule and participation moving forward. Throughout the revitalization of the property, input will be solicited from the community during site selection, remediation, post cleanup and redevelopment reuse planning. Announcement on the IBMI website, notice boards, and a scheduled community meeting. Public comments will be addressed in the Cleanup Plan and through the entire redevelopment project. Progress updates will utilize the Tribe's current website, quarterly newsletter, and the ACRES database. The PM will review the public input and respond to individuals or groups via telephone, email, or virtual meetings. Future comments and concerns received through the Housing Department (HD) from walk-up visits from concerned citizens as well as from emails shall be addressed.

3. Task Descriptions, Cost Estimates, and Measuring Progress *3.a Proposed Cleanup Plan*

The Tribe will develop a cleanup plan that will include remediation strategies/remediation cleanup options, scope of work and associated RFP, cleanup phases, milestones, protection for the environment and public health and detailed cost. Cleanup of the Site will follow Alternative 2 in the Tetra Tech, Inc. Draft Analysis of Brownfields Cleanup Alternatives (ABCA) dated, August 14, 2020, which includes; excavation of contaminated soils and debris that exceed commercial/industrial and residential screening levels, removal, and off-site disposal of the contaminated soil. This process will be performed strategically in critical areas prioritized for removal in the analysis plan. It is anticipated that EPA Cleanup funding will be used primarily for removal of contaminated soil. The most toxic soils will be disposed of in a Class I CA hazardous waste dump. *3.b.iv Outputs* – See the chart below. *i Project Implementation:* Implementation of the grant and completion of the project will be a collaborative effort between IBMI Amador County, City of Plymouth, PM, EPA Brownfield Staff and hired contractors. The 47.44-acre Project will be broken up into 5 Sites, for which the specific activities, deliverables, are summarized below. The northwest area being the first Site. To ensure the smooth management of the grant, compliant with all the reporting and procurement requirements, and timely completion of project tasks, the PM will work with Public Works and Environmental Health who will coordinate efforts to select the oversight consultant and remediation contractor who will primarily partake and complete the EPA funded cleanup activity. They will ensure that all environmental and grant requirements are met; and will perform all grant tracking compliance and reporting activities.

ii Anticipated Project Schedule (refer to table): It is anticipated that the project cleanup at the Target Area will start in the fall of 2021. The Tribe will be working toward having the personnel in place and the plan above set up so that it will be the most effective in cleaning the property. The QEP will be active in being sure the cleanup plan is going to be affective and the most expedient. All necessary persons, especially City of Plymouth departments and Amador County, are kept informed regarding all activities include the holding of community meetings to discuss with the community the step by step activities IBMI is going to take to remediate the cleanup. The PM will explain the timeframe of the cleanup activities, the potential start and end dates, and expected hazards associated with the cleanup procedure to the neighboring community. Outputs are a Community Outreach Plan along with the community meeting reports and comments received during the outreach activities. This task will be a cost share activity

3.b.iii Task/Activity Lead (refer to table) TASK 1 – Community Outreach: Activities include the holding of community meetings to discuss with the community the step by step activities IBMI is going to take to remediate the cleanup. The IBMI PM will explain the time frame of the cleanup activities, the potential start and end dates, and expected hazards associated with the cleanup procedure to the neighboring along with the community meeting reports and comments received during the outreach activities. This task will be a cost share activity.

Summary Table - Refer to Task Below for Detail

TASK	Task / Activity Lead	Outputs	Time Frame			
			Q1	Q2	Q3	Q4
1	Community Outreach	Community Outreach Plan	x	x		
		Qtr Reports, TBC, Annual Financials	x	x	x	x
2	Leads: PM, GM, & PW Establish Reporting Framework	Community Outreach Report Mtg Minutes, Material, Sign-in Sheet	x	x		
	Cleanup Planning Leads: PM, GM, & PW Contractor Selection	Health and Safety Plan		x		
3	Work Plan Approval	Contractor Required Permits				
	Cleanup Activities TPO, PM Site Cleanup - Contract Work IC Development Cultural Monitoring	HAZWOPER Training Certificates				
		Complete Contract w/ Contractors		x	x	x
		Cultural Monitoring Activities Rpt		x	x	x
		Sampling Plan	x	x		
		Landfill Receipts, Invoices		x	x	x
		Cleanup Completion Report				
		Copy of Work Plan, Acres Cleaned				
4	Management & Next Step Leads: Finance + PM, GM Establish Oversight Protocol Work Plan Procurement Land Use Planning	Expenditures & Closeout Reports	x	x	x	x
		Land Use Plan-Community Center				x

Task 2 - Cleanup Planning: Activities include developing safety procedures for staff working near the site during cleanup or on the site during monitoring. Additionally, a cleanup plan that details the expected entrances and exits by construction vehicles, any potential road closures or restricted access points, and hazard mitigation activities like dust abatement. Request for proposals and contractor selection will occur during this activity lead by the housing director who will attend HAZWOPER training to certify their presence at the hazardous cleanup operation Outputs include: a Cleanup plan, Health & Safety plan, HAZWOPER certificates , and approved contractor workplans .

Task 3 -Cleanup Activities: Activities for a successful cleanup include requesting for the contracting of a cleanup consultant, Project personnel and Field personnel (Equipment operator). Also, the successful completion of cleanup activities defined below (Adaptation of Alternative 2 in Final ABCA) and the development of a sampling plan. Choosing the right monitoring company is vital to the success of the cleanup. Specific activities include: 1) Excavation, segregation and stockpiling of contaminated soil and debris. Load out of hazardous soil assumes up to 13,150 cubic yards, 2) Hazardous material will be deposited in a Class I Disposal Site for hazardous material. Outputs include: Landfill receipts, cleanup completion report, cultural monitoring report, and sampling plan.

DESCRIPTION OF TASKS AND ACTIVITIES

BUDGET CATEGORIES		HAZARDOUS SUBSTANCE PROJECT TASKS				TOTAL
		Project Manage and Reporting	Community Outreach	Cleanup Planning	Implement Cleanup	
DIRECT COST	PERSONNEL	\$ 15,050.00	\$ 9,675.00	\$ 7,000.00	\$ 4,200.00	\$ 35,925.00
	FRINGE BENEFITS	\$ 5,267.50	\$ 3,386.25	\$ 2,450.00	\$ 1,470.00	\$ 12,573.75
	TRAVEL	\$ 250.00	\$ 250.00	\$ 100.00	\$ 150.00	\$ 750.00
	EQUIPMENT					\$ -
	SUPPLIES	\$ 600.00	\$ 600.00	\$ 500.00	\$ 250.00	\$ 1,950.00
	CONTRACTUAL			\$ 43,801.25	\$ 380,000.00	\$ 423,801.25
DIRECT COSTS						\$ 475,000.00
INDIRECT COST - 5%						\$ 25,000.00
20% COST (SHARE WAIVER SUBMITTED)		\$ 20,000.00	\$30,000.00	\$ 10,000.00	\$ 40,000.00	\$ 100,000.00
TOTAL BUDGET						\$ 600,000.00

¹Travel to brownfields-related training conferences is an acceptable use of these grant funds. ²EPA defines equipment as items that cost \$5,000 or more with a useful life of more than one year. Items costing less than \$5,000 are considered supplies. Generally, equipment is not required for Brownfield grants. ³Administrative costs (direct and/or indirect) for the Cleanup Grant applicant itself cannot exceed 5% of the total EPA-requested funds. ⁴Applicants must include the cost share in the budget even if applying for a cost share waiver (see Section III.B.13 for a list of applicants that may request a cost share waiver). See the Cost Share Waiver Submittal Letter attached. If the applicant is successful and the cost share waiver is approved, it will be removed in pre-award negotiation.

3.d Measuring Environmental Results: The project manager (PM) and the qualified environmental professional (QEP) procured by the IBMI will demonstrate expertise in overall grant management services including but not limited to routine audits, financial tracking systems, and policies for reporting. Additionally, contracts for procured firms are written to ensure environmental cleanup results are achieved through a Master Service Agreement whereby consultants provide a scope of work, detailed cost estimates, and timeline for completion of each task. Tribal Staff will utilize existing accounting systems track and report grant expenditures. The PM will use Assessment, Cleanup and Redevelopment Exchange System (ACRES) to track accomplishments. The PM along with the QEP will oversee all cleanup activities, which include a daily log with pictures, monitoring the contractors work, keep the public informed, progress reports to Tribal Council and the community. All progress will be measured against the schedule of outputs and number of acres cleaned up for commercial/industrial use. Tribal Staff will regularly meet with the EPA project manager to adjust the schedule and/or budget, if necessary. This schedule will be reviewed bi-weekly throughout the project to identify deviations in schedule as soon as they occur, so that corrective measures can be developed and implemented to maintain progress. Safety plans will be developed and adhered to so we can maintain the safest possible site. *Environmental Cleanup Results:* The anticipated cleanup results or outcomes for the both Sites will be documented and shall include the quantity of contaminated soil in acres and associated mass of individual contaminants of concern removed; the quantity of soil successfully treated to reduce metals concentrations to non-hazardous levels ; the land area made safe for public access through adequate removal/containment /control of contaminated soils, and acres of land cleaned up and available for redevelopment. *Redevelopment Outcomes:* Long-term redevelopment outcomes that will be tracked and measured will include a community center, senior affordable housing, open space with trails and walk paths for elders and families to enjoy.

4 Programmatic Capability and Past Performance *4.a Programmatic Capability:* IBMI is governed by five elected members, Tribal Council. The council is active and engaged in all aspects of the tribal government. The experience gained from ongoing work with HUD and BIA grant-funded programs for transportation and community development has built high level of knowledge and expertise with staff. IBMI has a depth of understanding of the financial and contractual

demands of the grant and will continue to develop efficiencies in this project due to the knowledge of federal grant funded programs. The Accounting Department, Grant Manager, and Project Manager will oversee the management system for successful completion of the Brownfield Cleanup grant. *i Organizational Structure:* The Cleanup Grant activities including assessment, planning, design, remediation, construction, and community engagement that will be led by the HD be supported by other IBMI key departments, including Grant Administrator and Fiscal department. The above staff have managed and administered multiple grants and are familiar with all steps and strategies necessary for a timely and successful expenditure of funds, as well as the EPA Grant technical, administrative, and reporting requirements. The Accounting department will be processing invoices as well as providing financial administrative support. **IBMI Director of Housing (Project Manager/PM):** Robert Stevens, along with the QEP, will oversee the overall cleanup of the property. Robert has many years of experience in the construction field. He will be responsible for maintaining all required documentation and report accomplishments in ACRES for the project. **IBMI Grant Manager (GM):** Theresa Nantor will assist the PM with the programmatic management activities of the grant. She has over 15 years' experience in nonprofit and tribal grant development; and compliance and monitoring. **IBMI Historic Preservation Officer (THPO):** Jeremy Dutschke has several years' experience in cultural resource protection and Traditional Ecological Knowledge. **Qualified Environmental Professional (QEP):** See 4.a.iii. HUD guidelines must be used to hire the Environmental Professional. This will be done as soon as the Grant is approved.

4.a.iii Acquiring Additional Resources the EPA Brownfields funds will follow all Federal rules and regulations governing the use of such funds to appropriately acquire expertise and additional resources from a QEP. All procurement transactions will be conducted in a manner providing a full, free, and open competition consistent with Federal Regulations. The contractor will work under an approved contract and scope of work. Consultant contracts/services will follow the same bidding process that corresponds to the amount of the contract/service Formal Competitive Bid.

4.b Past Performance and IBMI has managed and administered all past grant successfully. The IBMI's Accounting Department has policies and procedures in place that adhere to federal grants management standards. *4.b.ii.1 Purpose and Accomplishments.* For more than 10 years, the IBMI have received a formula grant from the U.S. Department of Housing and Urban Development (HUD) Indian Housing Block Grant (IHBG). In FY2020 (\$364,111) and FY19 (\$311,531), the Tribe received grant funds for housing related activities for low to moderate income persons. Also, the Tribe receives funds from the Bureau of Indian Affairs (BIA) for general operating expenses.

4.b.ii.2 Compliance with Grant Requirements. All cost charged to the Cleanup Grant will be consistent with the requirements of 2 CFR Part 200, Subpart E. The IBMI departments function in adherence to the established administrative and financial policies and procedures. The Tribe's Accounting Department is charged with the accounting and reporting of IBMI programs. The Accounting Office must use Generally Accepted Accounting Practices (GAAP) in the performance of their duties, and IBMI is required to conduct A-133 audits on an annual basis. IBMI has a record of acquiring and operating external funding from a wide variety of sources including both public and private sources. IBMI has managed and administered federal grants and contracts in the past and has the capacity to administer the requested funds for this project. IBMI uses standard reporting forms as well as specific program reports to assure proper documentation of program progress. A detailed record keeping system is in place to maintain and utilize all information measuring the progress toward the achievement of administrative objectives.

Ione Band of Miwok Indians

III.B.1 Applicant Eligibility: The Ione Band of Miwok Indians (IBMI) are a federally recognized tribe and thus eligible for the EPA's Brownfield Cleanup Grant.

III.B.2 Previously Awarded Cleanup Grants: Ione Band of Miwok Indians has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

III.B.3 Site Ownership: The Subject Property is solely owned by the Ione Band of Miwok Indians and consists of five adjacent parcels: 008-070-043, 008-070-044, 008-070-045, 008-070-046, and 008-070-047. The IBMI acquired the five parcels that make up the 47.44 acres as shown on the recorded deed.

III.B.4 Basic Site Information

- a. New London Mine occupies the southwestern portion of the Subject Property it is a distressed area with heavily overgrown with brush and trees. An ephemeral watercourse flows north to south through the Subject Property.
- b. Old County Road, Plymouth, California 95669 consists of five adjacent parcels: 008- (Assessor's Parcel Numbers: 070-043, 008-070-044, 008-070-045, 008-070-046, and 008-070-047).
- c. Ione Band of Miwok Indians are the sole owner of the subject property.

III.B.5 Status and History of Contamination at the Site

- a. Contamination: The Target Brownfield Site, consisting if the 47.44 acres, in which IBMI is requesting funding, is contaminated with hazardous levels of lead, arsenic, and mercury. These contaminants exceed commercial/industrial and RSL(Residential Screening Level) and ESL (Environmental Screening Level). The screening levels include: Lead, Arsenic and Mercury.
- b. Operational Uses and Current Uses: Mining occurred at the Site between the late 1800s and early 1900s. The western and southern parts of the Subject Property was originally developed as the New London Mine and associated processing mill. Within a small portion of the southwestern corner of the Subject Property, a temporary lumber mill operated at an unknown time. Periodic livestock grazing has occurred at the Subject Property since mining activities ceased Ecology and Environment, Inc. (E&E 2014). The sawmill practices resulted in release of arsenic. Currently, the Subject Property is vacant with overgrown trees and brushes.
- c. Environment Concerns: A Targeted Site Investigation (TSI) by E&E was performed on the entire 47.44-acre former New London Mine property in January 2014, The TSI identified that arsenic, lead, and mercury was in the soil and surface sediments.

The most elevated concentrations of arsenic in surface soil were in the northern and southwestern portions of the property. Additionally, the most elevated concentrations of

lead in surface soil were in the north-central and southwestern portions of the property. E&E analyzed all samples for arsenic, lead, and mercury and a select number for cyanide. The results are summarized below:

- Lead was detected the surface soil was detected at concentrations up to 1,000 milligrams per kilogram (mg/kg), and one surface soil sample contained lead at 69,000 mg/kg, sample #158, which E&E considered an outlier; detections of lead in surface soil at adjacent sample locations were several orders of magnitude lower. Lead was in the surface sediment along the ephemeral watercourse was detected at concentrations up to 2,100 mg/kg.
 - Arsenic was detected in the surface soil at concentrations up to 610 mg/kg, exceeding the calculated local background of 32 mg/kg. Arsenic in surface sediment was detected at concentrations up to 280 mg/kg.
 - Mercury was detected in surface soil at concentrations up to level of 2.2 mg/kg. Also, Mercury was detected in surface sediment at concentrations up to 6.8 mg/kg.
- d. Contamination Source and Quantity: According to the assessment performed on the Subject Property, the New London Mine, contributed to the contaminated soil on the property. The Target Site Investigation completed in 2014, the contamination occurred because of the gold processing chemicals, on and off-site adverse impacts from acid rock drainage, and the disposal of mill tailings into an adjoining creek all due to past mining uses of the Subject Property. Contamination primarily resulted from the common practice of praying oil and incinerator ash on mill roads for dust suppression purposes. Other activities that may have resulted in contamination included the former Plymouth Consolidated Mine properties.

Also, the Phase I ESA did not differentiate between past use of the Subject Property, which contains the former New London mine/mill, and past use of the former Plymouth Consolidated Mine properties, which formerly contained the subject property. According to the Phase I ESA, the Plymouth Consolidated Mine operated continuously from 1859 to 1888 and intermittently from 1911 to 1939. A small portion of the southwest corner of the property was used to stage a temporary portable lumber mill, although the Phase I ESA does not specify when the lumber mill operated.

The recognized environmental conditions (RECs) identified in the 2007 Phase I ESA did not distinguish between RECs that apply to the adjacent Plymouth Consolidated Mine and mill property and those that apply to the subject property. Most of the RECs identified in the Phase I ESA do not apply to the subject property. The Phase I ESA identified the following RECs in connection with the properties assessed (E&E 2014).

Per ABCA Targeted Brownfield Assessment the Stockpile and Stockpile 2 Study Areas: Arsenic was detected at 164 and 33.9 mg/kg in the composite samples from the Stockpile and Stockpile 2 Study Areas, respectively. Lead in the Stockpile Study Area was below the DTSC screening level for residential receptors of 80 mg/kg but slightly exceeded the DTSC screening level in the Stockpile 2 Study Area (at 80.8 mg/kg). Mercury

concentrations were below DTSC screening levels. Cyanide was not detected in either of the composite samples from the Stockpile and Stockpile 2 Study Areas.

III.B.6 Brownfields Site Definition

CERCLA1 defines a Brownfield Site as: ...real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. Brownfield sites include residential, commercial, and industrial properties.

The subject property meets the above definition of a brownfields site is:

- not listed on the National Priorities List
- subject to unilateral administrative orders, court orders, administrative orders on consent or judicial consent decrees issued to or entered into by parties under CERCLA
- nor is it subject to the jurisdiction, custody, or control of the U.S. government.

III.B.7 Environmental Assessment Required for Cleanup Applications

A Phase II Environmental Site Assessment Targeted Brownfields Assessment Report was conducted on the property, which encompassed the Target Area, by Ecology and Environment, Inc. (E&E) in 2014, following a Phase I update from E&E in 2012 the original Phase I was conducted in 2007 by Youngdahl Consulting Group, Inc.(Youngdahl) for the New London Mine. These tests are compliant to ASTM E1903 and were completed before the application submission. The Environmental Site Assessment (ESA) Phase II ESA included soil sampling and equipment rinse blanks were analyzed for arsenic and lead by U.S. EPA Method 6010B and mercury by U.S. EPA Method 7471A. Soil samples collected from the Stockpile and Watercourse study areas were additionally analyzed for total cyanide by U.S. EPA Method 9010C (E&E 2014). A total of 12 of the samples were selected for additional analysis of leachable concentrations of lead, arsenic, and/or mercury. The leachability tests were performed to categorize contaminated soil by waste type for the purpose of estimating cleanup costs as part of the remedial alternative evaluation presented later in this report. A total of seven samples were analyzed for solubility threshold limit concentration (STLC) arsenic, six samples were analyzed for toxicity characteristic leaching procedure (TCLP) arsenic, six samples were analyzed for STLC lead, five samples were analyzed for TCLP lead, five samples were analyzed for STLC mercury, and five samples were analyzed for TCLP mercury. All samples analyzed for STLC or TCLP metals were analyzed by the West Sacramento, California office of Test America Laboratories, Inc. (Test America), a START subcontract laboratory (E&E2014).

III.B.8 Enforcement or Other Actions

There are no liens against the Subject Property nor are there any anticipated environmental enforcement or other actions related to the property.

III.B.9 Sites Requiring a Property-Specific Determination

Threshold Criteria: Ione Band of Miwok Indians Brownfield Cleanup Grant

IBMI's Subject Property does not require a property specific determination. It:

- **Is not** site/property/facility subject to planned or ongoing removal actions under CERCLA;
- **Is not** site/property/facility that have been issued or entered into a unilateral administrative order, a court order, an administrative order on consent, or judicial consent decree or to which a permit has been issued by the United States or an authorized state under the Resource Conservation and Recovery Act (RCRA), the Federal Water Pollution Control Act (FWPCA), the Toxic Substances Control Act (TSCA), or the Safe Drinking Water Act (SDWA);
- **Is not** site/properties/facility subject to RCRA corrective action (§ 3004(u) or § 3008(h)) to which a corrective action permit or order has been issued or modified to require the implementation of corrective measures.
- **Is not** site/property/facility that are land disposal units that have submitted a RCRA closure notification or that are subject to closure requirements specified in a closure plan or permit.
- **Is not** site/property/facility where there has been a release of polychlorinated biphenyls (PCBs) and all, or part, of the property is subject to TSCA remediation; and
- **Is not** site/property/facility that receives monies for cleanup from the Leaking Underground Storage Tank (LUST) Trust Fund

III.B.10 Threshold Criteria Related to CERCLA/Petroleum Liability

This application is for the Target Area in the **northern corner and along the eastside** of the Subject Property located at 40 Old County Plymouth, CA 95699, which hazardous materials are planned to be removed from the site; therefore, only a response under 10 a is required.

III.B.10.a Property Ownership Eligibility - Hazardous Substance Sites

IBMI are the sole owners of the Subject Property. IBMI is a federally recognized Indian tribe and EPA does not consider Indian Tribes to be liable under CERCLA; therefore, tribes are exempt from demonstrating that they meet the requirements of a CERCLA liability defense to be eligible for the Brownfields Grant.

III.B.11 Cleanup Authority and Oversight Structure

III.B.11.a Cleanup Oversight: The cleanup process for the Target Area will remove all the hazardous waste identified on site. The excavation, offsite disposal, and backfill of the identified hazardous site be contracted out to other companies more familiar with the work. Robert Stevens, IBMI's housing director will be present to supervise and over see the completion of the project along with other IBMI personnel trained in HAZWOPER Certification (Program Administrator and Tribal Historic Preservation Officer). Additional personnel with technical expertise to conduct, manage, and oversee the cleanup will be contracted onto the project to verse that the waste is fully removed and disposed of offsite in the appropriate hazardous waste facility or in any area on the property that can be capped. Excavated soils would be consolidated on site and capped, possibly in the southwestern portion of the Site where elevated concentrations of arsenic and lead have been identified or at another location that would not interfere with future uses (ABCA 2020).

III.B.11.b Access to Adjacent Properties: IBMI Subject Property can be accessed from Bush Street which connects to Old Country Road. The Subject Property has five adjacent parcels characterized by rolling hills covered by grasses and trees crossed by a single southerly-flowing ephemeral watercourse, which empties into a seasonal wetland located on a parcel adjacent to the southern boundary of the Subject Property. Undeveloped land is located immediately adjacent to the subject property to the west, south, and east. Adjacent to the subject property to the north, across Old County Road, is the location of the former Plymouth Consolidated Mine. Area land use is primarily commercial and residential north and southwest of the former New London Mine and agricultural or undeveloped in other directions. (E&E, 2014)

III.B.12 Community Notification

III.B.12.a Draft Analysis of Brownfields Cleanup Alternatives : The IBMI's Housing Department posted a Community Notification Ad on September 28, 2020 to notify the community of the opportunity to analyze and comment on IBMI's draft proposal of the EPA Brownfield Cleanup grant and weigh in on set of alternatives (ABCA) for the cleanup. This notification provided a two (2) week period in which to comment and the following channels in which to do so: a public meeting scheduled for October 15, 2020; reviewing the draft and ABCA at the Housing Department in the Tribal Office to make comments, and/or submitting comments to the Tribal Administrator. Within the Community Notification Ad, the draft ABCA was briefly summarized and the recommended cleanup alternatives listed. With the input from the community, the IBMI will develop a cleanup plan that will include remediation draft/remediation cleanup options, scope of work and associated RFP, cleanup phases, milestones, protection for the environment and public health and detailed cost. Cleanup of the Site will follow Alternative 2 in the Tetra Teck, Inc. Draft Analysis of Brownfields Cleanup Alternatives (ABCA) dated, August 14, 2020, which includes; excavation of contaminated soils and debris that exceed commercial/industrial and residential screening levels, removal, and off-site disposal of the contaminated soil. This process will be performed strategically in critical areas prioritized for removal in the analysis plan. It is anticipated that EPA Cleanup funding will be used primarily for removal of contaminated soil. The most toxic soils will be disposed of in a Class I CA hazardous waste dump.

III.B.12.b Community Notification Ad

The community notification provided the following information:

1. The community notification ad was published on IBMI's website
2. The community notification as was posted at the entrance to public facility such as IBMI, Tribal Office.
3. The flyer was posted for all Tribal member household in Amador County
 - a public meeting time, date and location (October 15, 2020 at 4:00pm at 9252 Bush Street in Plymouth, CA 95669) to discuss actions and alternatives
 - the location of review documents (ABCA) FY2021 EPA Brownfield Cleanup Grant proposal to review and comment upon in the Housing Department and the office hours and contact information

Threshold Criteria: Ione Band of Miwok Indians Brownfield Cleanup Grant

- how the community can submit comments in writing about the ABCA and EPA proposal to IBMI's Tribal Administrator with the email address and the physical address

III.B.12.c Public Meeting: IBMI's Housing Department planned a public meeting on **October 15, 2020 at 4:00pm** at 9252 Bush Street Plymouth, CA 95669. Unfortunately, no one attended the community meeting. This is not uncommon for IBMI's community as there is routinely little participation in General Council Meetings. The Housing Department did not receive any comments.

III.B.12.d Submission of Community Notification Documents. Attached are the following documents and community notifications: a copy of the draft ABCA, a copy of the Public Notice flyer (or Newsletter) that demonstrates notification to the public and solicitation for comments on the application, the comments or a summary of the comments received during IBMI's community outreach activities, IBMI's response to those public comments, meeting notes or summary from the public meeting(s); and meeting sign-in sheets/participant list.

III.B.13 Statutory Cost Share

III.B.13.a Meet Required Cost Share: The IBMI is requesting a hardship waiver for the 20% cost share and has attached the required document to this application. However, if the request is denied for the cost share, the IBMI can provide cost share via in-kind contributions of staff time and materials. Per task 1 for programmatic requirements, the IBMI will provide cost share via direct staff time and supplies. Per Task 2 for Community Outreach, the IBMI will meet the cost share requirement by providing a meeting space, in-kind staff time for development of presentation materials, stakeholder engagements, and supplies. Per Task 3 for Cleanup Implementation, the IBMI may contribute materials such as backfill and labor for cleanup efforts including the grading permit and/or land use implementation and development of a soil management plan. The remaining cost share is attributed to personnel, supplies, and a contribution for contractual management for reporting in Task 5.

III.B.13.b Hardship Waiver: The Hardship Waiver Request is attached.

RECORDING REQUESTED BY

PLACER TITLE COMPANY

Escrow Number: 90-6640-SWB

AND WHEN RECORDED MAIL TO

IONE BAND OF MIWOK INDIANS
P.O. BOX 1190
IONE, CA 95640



Amador County Recorder

Sheldon D. Johnson

DOC- 2007-0011918-00

Acct 4-Placer Title Co

Friday, NOV 09, 2007 10:30:00

Ttl Pd \$25.00

Nbr-0000156887

SDJ/R1/1-4

A.P.N.: 008-070-043; 008-070-044; 008-070-045; 008-070-046; 008-070-047 SPACE ABOVE THIS LINE FOR RECORDER'S USE

GRANT DEED

The undersigned grantor(s) declare(s):

Documentary transfer tax is Tax Paid; Section 11932 R & T Code City Transfer Tax:

(X) computed on full value of property conveyed, or

() computed on full value less value of liens and encumbrances remaining at time of sale.

FOR A VALUABLE CONSIDERATION, receipt of which is hereby acknowledged, **PLYMOUTH EMPIRE PROPERTIES, A CALIFORNIA CORPORATION**

Hereby GRANT(S) to **IONE BAND OF MIWOK INDIANS**


THE LAND DESCRIBED HEREIN IS SITUATED IN THE STATE OF CALIFORNIA, COUNTY OF AMADOR, UNINCORPORATED AREA, AND IS DESCRIBED AS FOLLOWS:

SEE EXHIBIT "A" ATTACHED HERETO AND MADE A PART HEREOF FOR FULL LEGAL DESCRIPTION

Dated: November 05, 2007

PLYMOUTH EMPIRE PROPERTIES, A CALIFORNIA CORPORATION

By:


Carol Emerson, Vice President

MAIL TAX STATEMENTS TO PARTY SHOWN ON FOLLOWING LINE; IF NO PARTY SHOWN, MAIL AS DIRECTED ABOVE

SAME AS ABOVE

Name

Street Address

City & State

O:\grdnott.doc (4/2002)

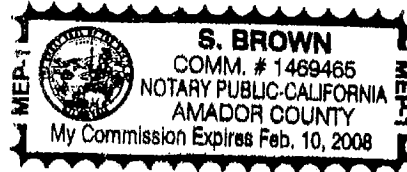
STATE OF CALIFORNIA
COUNTY OF AMADOR

On 11-8-07 before me, S. Brown, Notary Public,
personally appeared Carol Emerson

personally known to me (or proved to me on the basis of satisfactory evidence) to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument

WITNESS my hand and official seal.

Signature: [Signature]
Commission Expiration Date: 2/10/08



MAIL TAX STATEMENTS TO PARTY SHOWN ON FOLLOWING LINE; IF NO PARTY SHOWN, MAIL AS DIRECTED ABOVE

SAME AS ABOVE

Name _____ Street Address _____ City & State _____

0:\grdnott.doc (4/2002)

EXHIBIT "A"
LEGAL DESCRIPTION

THE LAND DESCRIBED HEREIN IS SITUATED IN THE STATE OF CALIFORNIA, COUNTY OF AMADOR, UNINCORPORATED AREA, AND IS DESCRIBED AS FOLLOWS:

PARCEL ONE:

ALL THAT CERTAIN PROPERTY SITUATE IN A PORTION OF THE SOUTH HALF OF SECTION 11, TOWNSHIP 7 NORTH, RANGE 10 EAST, M.D.M., AMADOR COUNTY, CALIFORNIA, BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

PARCEL 1 AS SHOWN ON THAT CERTAIN RECORD OF SURVEY FOR BOUNDARY LINE ADJUSTMENT ON FILE IN THE OFFICE OF THE COUNTY RECORDER OF SAID AMADOR COUNTY IN BOOK 56 OF MAPS AND PLATS AT PAGE 41 THEREON.

EXCEPTING THEREFROM THAT PORTION OF PREMISES GRANTED TO THE SUCCESSORS AND HEIRS OF ELLA DERANIA, IN THAT QUITCLAIM DEED RECORDED OCTOBER 28, 2005 INST. NO. 2005/0014949 OF AMADOR COUNTY OFFICIAL RECORDS.

APN NO. 008-070-043-000

PARCEL TWO:

ALL THAT CERTAIN REAL PROPERTY SITUATE IN A PORTION OF THE SOUTH HALF OF SECTION 11, TOWNSHIP 7 NORTH, RANGE 10 EAST, M.D.M., AMADOR COUNTY, CALIFORNIA, BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

PARCEL 2 AS SHOWN ON THAT CERTAIN RECORD OF SURVEY FOR BOUNDARY LINE ADJUSTMENT ON FILE IN THE OFFICE OF THE COUNTY RECORDER OF SAID AMADOR COUNTY IN BOOK 56 OF MAPS AND PLATS AT PAGE 41 THEREOF.

APN NO. 008-070-047-000

PARCEL THREE:

ALL THAT CERTAIN REAL PROPERTY SITUATE IN A PORTION OF THE SOUTH HALF OF SECTION 11, TOWNSHIP 7 NORTH, RANGE 10 EAST, M.D.M., AMADOR COUNTY, CALIFORNIA, BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

PARCEL 3 AS SHOWN ON THAT CERTAIN RECORD OF SURVEY FOR BOUNDARY LINE ADJUSTMENT ON FILE IN THE OFFICE OF THE COUNTY RECORDER OF SAID AMADOR COUNTY IN BOOK 56 OF MAPS AND PLATS AT PAGE 41 THEREOF.

APN NO. 008-070-046-000

PARCEL FOUR:

ALL THAT CERTAIN REAL PROPERTY SITUATE IN A PORTION OF THE SOUTH HALF OF SECTION 11, TOWNSHIP 7 NORTH, RANGE 10 EAST, M.D.M., AMADOR COUNTY, CALIFORNIA BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

PARCEL 4 AS SHOWN ON THAT CERTAIN RECORD OF SURVEY FOR BOUNDARY LINE
ADJUSTMENT ON FILE IN THE OFFICE OF THE COUNTY RECORDER OF SAID AMADOR COUNTY
IN BOOK 56 OF MAPS AND PLATS AT PAGE 41, THEREOF.

APN NO. 008-070-044-000

PARCEL FIVE:

ALL THAT CERTAIN REAL PROPERTY SITUATE IN A PORTION OF THE SOUTH HALF OF SECTION
11, TOWNSHIP 7 NORTH, RANGE 10 EAST, M.D.M., AMADOR COUNTY, CALIFORNIA, BEING
MORE PARTICULARLY DESCRIBED AS FOLLOWS:

PARCEL 5 AS SHOWN ON THAT CERTAIN RECORD OF SURVEY FOR BOUNDARY LINE
ADJUSTMENT ON FILE IN THE OFFICE OF THE COUNTY RECORDER OF SAID AMADOR COUNTY
INBOOK 56 OF MAPS AND PLATS AT PAGE 41, THEREON.

APN 008-070-045-000

END OF DOCUMENT

Grddnott.doc



Lone Band of Miwok Indians

A Federally Recognized Sovereign Tribe

Lone Band of Miwok Indians
9252 Bush Street Suite 2
Plymouth, CA 95669

October 22, 2020

Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, CA 94105

Subject: Hardship Waiver Request

The Lone Band of Miwok Indians is a non-gaming Federally recognized Native American Tribe that is located in Amador County, California. IBMI is located just outside the city limits of Plymouth which has a population of 1,034. The State of California median income and the national median income is \$61,198. The per cap income for Amador County is \$30,100 (U.S. Census). We are requesting a waiver of the twenty percent (20%) cost share requirement for the EPA's Brownfield Cleanup grant based on demographic and economic factors. Our membership population consists of over 750 members, many of whom are low, to extremely low, income and in need of housing.

The IBMI is the sole owner of the 47.44 acres of land, located on the south side of Plymouth City Limits. Our once landless Tribe purchased the 47.44 acres, which is part of its' ancestral land. The Tribe purchased the land with the hope to develop a community center, senior housing, and affordable housing. The goal is to restore the Native American Homeland, increase cultural pride and improve the environmental health of the community. The 47.44 acres is not in Trust, so by developing the land for elderly and low-income families we will benefit both Tribe members and the residents of Plymouth.

Like many rural small towns, Plymouth, has been affected by economic disinvestment and environmental contamination left by those defuncted industries, mainly gold mining. The closure of lumber mills and mines had a long-lasting impact on redevelopment efforts in Plymouth due to the high levels of arsenic and lead. Amador County lacks the elements to foster successful redevelopment that will lead to higher incomes and jobs. The second largest industry in Amador County is arts, entertainment, and recreation, accommodation, and food services all of which have been significantly impacted by the recent pandemic (American Community Survey, 2018). The August Labor Report shows, the unemployment rate in Amador County is approaching ten percent (10%) (CA Department of Labor).

Without the approval of this Hardship Waiver Request, the New London Mines project could still proceed via the in-kind contributions and materials; however, it would potentially exhaust the Tribe's limited resources. The Brownfields Cleanup Grant will provide much needed funding for environmental cleanup, planning activities, and redevelopment that otherwise may be delayed. Plus, the negative impact on the populations will continue to be impacted.

Sincerely,

Sara Dutschke
Tribal Chairperson

Hardship Waiver Request

The lone Band of Miwok Indians is a Nationally Recognized Indian Tribe and is requesting a hardship waiver for the 20% cost share and has attached the required document to this application. However, if the request is denied for the cost share, the IBMI will make every effort to cost share via in-kind contributions and materials as listed below.

Task 1: COMMUNITY INVOLVEMENT.

Through the first and second quarters we will continue to reach out to the community to relate our plan and the success of the operation. We will meet the cost share by providing direct staff time and supplies for Community Outreach Reporting.

Task 2: CLEANUP PLANNING.

For Community Outreach, the IBMI will meet the cost share requirement by providing a meeting space to explain to the community the cleanup efforts, in-kind staff time for development of presentation materials, stakeholder engagements, and supplies. Complete contracts with contractors and consultants.

Task 3: CLEANUP ACTIVITIES.

The IBMI will contribute the Cultural Monitoring Activities and the reporting and sampling that may take place. Monitor the test results and communicate the success of the cleanup.

Task 4: Administration and Next Step: IBMI can meet the cost sharing by providing copies of the work plan, number of acres cleaned, Budget Expenditures and Close Out Reports.

The Hardship Waiver Request is attached.

PUBLIC COMMENT REQUEST

September 29, 2020

The lone Band of Miwok Indians (IBMI) is in the process of applying for a Brownfield Grant from the EPA, (Environmental Protection Agency), to clean up the 47.44 acres the Tribe owns just south of the Plymouth City Limits at Bush Street and Old County Road. It is Tribes intent to remove any contaminates that may cause harm to the public or make the land unsuitable for the needs of the City of Plymouth.

The lone Band of Miwok Indians is requesting that you submit any comments or questions to the Tribe's office by email to the address below:

Robert@ionemiwok.net

Or you can mail your comments and questions to the office at:

lone Band of Miwok Indians
PO Box 699
Plymouth, CA 95669

We will respond to all questions or comments that are received in our office by mail or email.

Due to the Covid 19 restrictions we will be holding an informational conference call on October 15, 2020, at 6:00 pm, to address any concerns you may have regarding the proposed work that needs to be done on the 47.44 acres.

To join the meeting on a computer or mobile phone: <https://bluejeans.com/310226492?src=calendarLink>

Phone Dial-in

+1.408.419.1715 (United States(San Jose))

+1.408.915.6290 (United States(San Jose))

Global Numbers: <https://www.bluejeans.com/numbers>

Meeting ID: 310 226 492

Want to test your video connection?

<https://bluejeans.com/111>

Room System

199.48.152.152 or bjn.vc

Meeting ID: 310 226 492



3.3 COMPARISON OF ALTERNATIVES

The cleanup alternatives selected for evaluation were assessed to determine effectiveness, the ability to implement, and the cost of the proposed cleanup.

- **Alternative 1, No Action**, would not be protective of human health and the environment and would not meet the project goal for the Site.
- **Alternative 2, Excavation and Off-Site Disposal**, would involve the excavation of contaminated soils above residential and commercial/industrial cleanup standards. This alternative would allow for the redevelopment of the Site as planned; however, ICs would be required where contamination above residential cleanup standards will remain in place. This alternative is the least expensive.
- **Alternative 3, Excavation, Consolidation, and On-Site Capping**, would involve the excavation of contaminated soils (as with Alternative 2). However, soils would be consolidated on-site and capped as opposed to disposed of off-site. This alternative would allow for the redevelopment of the Site as planned; however, ICs would be required for the capped area and long-term O&M would be needed to ensure the cap is maintained and ICs remain protective. This alternative is the second least expensive.
- **Alternative 4, Partial Excavation and Off-Site Disposal Combined with In-Place Capping**, would involve the excavation of areas where hazardous waste and leachable metals have been identified, as well as the off-site disposal of these soils and sediments at a permitted disposal facility. Areas of the Site with non-hazardous and non-leachable metals would be capped in place. As with Alternative 3, ICs would be required for the capped area and where contamination remains above residential cleanup standards. Long-term O&M would be needed to ensure the cap is maintained and ICs remain protective. This alternative is more than three times the cost of Alternative 3, primarily because of the costs of capping and long-term O&M.
- **Alternative 5, In-Place Capping**, would involve the capping of contaminated soils in place either with an unlined earthen cap or a lined cap, depending on if the contaminated soil and sediment is hazardous and if leachable metals have been identified. Because of the extent of contamination across the Site, this alternative would involve capping a large area and is the most expensive of the alternatives presented. ICs would be required for the capped areas, and long-term O&M would be needed to ensure the caps are maintained and ICs remain protective. This alternative is the most expensive.

Areas Affected by Project (Cities, Counties, States, etc.)

City: Plymouth

County: Amador

State: California

Native American Tribe: Ione Band of Miwok Indians

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

10/28/2020

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: Ione Band of Miwok Indians

* b. Employer/Taxpayer Identification Number (EIN/TIN):

911776853

* c. Organizational DUNS:

0155406850000

d. Address:

* Street1:

9252 Bush Street Suite 2

Street2:

* City:

Plymouth

County/Parish:

Amador

* State:

CA: California

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

95669-8402

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Mr.

* First Name:

Robert

Middle Name:

* Last Name:

Stevens

Suffix:

Title: Housing Director

Organizational Affiliation:

Ione Band of Miwok Indians

* Telephone Number:

209-253-1749

Fax Number:

209-245-6377

* Email:

robert@ionemiwok.net

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

I: Indian/Native American Tribal Government (Federally Recognized)

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-20-07

* Title:

FY21 GUIDELINES FOR BROWNFIELD CLEANUP GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

1234-Areas Affected by Project.pdf

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Ione Band of Miwok Indians Brownfield Cleanup Grant

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="500,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="100,000.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="600,000.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email: * Signature of Authorized Representative: * Date Signed: